

## REMARKS

### I. Status of the Application

Claims 1-20 are pending in this application. In the December 28, 2007 office action, the Examiner:

A. Rejected claims 1, 2, 7, 14-17 under 35 U.S.C. § 102(e) as being anticipated by US Pub 2003/0023874 to Prokupets et al. (hereinafter “Prokupets”); and

B. Rejected claims 3-6, 8-13, 18-20 under 35 U.S.C. §103(a) as being unpatentable over Prokupets et al. in view of US Pub 2006/0114842 to Miyamoto et al. in further view of US 6,144,736 to Koenig et al.

In this response, applicants have amended claims 1, 7 and 13-19 to clarify the claimed subject matter. Claims 15-19 have, in particular, been amended to correct an inadvertent error in the recited dependencies of those claims. Applicants respectfully traverse the rejection of claims 1-20 over the prior art and respectfully request reconsideration in view of the foregoing amendments and accompanying remarks.

### II. Prokupets Does Not Anticipate Claim 1

Claim 1 stands rejected as allegedly being anticipated by Prokupets. However, as will be discussed below in detail, Prokupets fails to disclose each and every element of claim 1. In particular, Prokupets fails to disclose or suggest “an isolating router coupling said first network to said second network and operable to isolate said first network from data transmission traffic in said second network, the isolating router comprising a router configured to receive and store data packets, and to forward the received data packets”, as

claimed in amended claim 1. Accordingly, it is respectfully submitted that the rejection of claim 1 over Prokupets is in error and should be withdrawn.

A. The Amendments to Claim 1

Claim 1 has been amended to recite that the isolating router comprises “a router configured to receive and store data packets, and to forward the received data packets”. This amendment merely clarifies what is meant by “router”. The specification as filed clearly discloses an isolating router 72 that is in the form of an IP router. (See specification at p.22, line 8). It is well known in the art that an IP router is among the types of routers that receive and store data packets, and then forward the received packets. Such operations of an IP router are well-known and defined by standard.

B. Prokupets Does Not Disclose a Router as Claimed

It is respectfully submitted that Prokupets fails to disclose any router, as that term is normally used, and particularly a router that is “configured to receive and store data packets, and to forward the received data packets”.

In particular, in a prior response to office action filed November 6, 2007, applicants argued that Prokupets failed to disclose an isolating router as claimed. (Pp.9-11). In response, the Examiner contended that the security server 12 of Prokupets constitutes a router because it receives alarm data, and then generates and “routes” messages to other devices. (See Final office action at p.9). It is respectfully submitted that the security server of Prokupets does not constitute a “router” as that term is normally used by one in the art, and certainly not as claimed in amended claim 1.

Specifically, the Examiner relied on the following paragraph of Prokupets as evidencing that the security server 12 was a “router”:

Referring to FIG. 1, a system 10 is shown having a computer server system referred to herein as the security server 12, with memory storing a central database 14. The security server 12 represents a network capable computer system, and memory storing central database 14 may be a hard disk drive, or a separate memory storage unit coupled to the security server 12. The security server 12 is connected to facility protection systems 22 and information systems 18, via a network 20, in which systems 18 and 22, and security server 12, each have an interface (hardware and software) enabling network communication. Network 20 represents any typical computer network, such as LAN, WAN, or Internet, in which each component in the network has an IP address. Data may be sent through the network 20 in packets, or files, to components by their IP address, as typical of network communication protocol. Although less preferred, one or more components in system 10 may be serially connected to communication ports on security server 12 in which a typical serial communication protocol is used. As will be described, *security server 12 receives event data from systems 18 and 22, logs them in the central database 14, routes events to alarm monitoring clients and to the event transaction processor and then, depending on the event data, outputs action data packets (requests) to such systems 18 and 22, different from the system from which the event data is received, to take specific actions automatically and in real-time.* The security server 12 may send in response to event data, messages to one or more output devices 16, such as automated calls to pagers, telephones, or e-mail, or other communication systems. Output devices 16 include the appropriate interfaces to such communication systems for such systems to operate in accordance with phone numbers or e-mail addresses.

(Prokupets at p.3, paragraph 0021) (emphasis added to show context of portions quoted by the Examiner).

The above-quoted paragraph clearly describes an *application* operation, and not a *router* operation. In particular, the above-quoted paragraph describes an operation in which event data is received, and then is processed by the server to generate new or responsive data. The server does not operate as a conduit of *data packets*, but rather an application that processes data and generates new content for data packets for transmission to other devices. By contrast, the term router ordinarily describes a device that operates as a transport or switching mechanism for existing data packets. In a router, the data is not processed by an application to generate new content. Instead, the received data packets are merely stored and forwarded to a destination.

In further review of the rejection of claim 1, the Examiner quotes Prokupets teaching that the security server "...outputs action data packets to such systems". (Final office action at p.9). While this passage states that the security server of Prokupets "outputs" data packets, such data packets are not packets that were previously received and queued for further transmission, as would be the case with a router. The "action data packets" of Prokupets are newly generated by an application at the security server 12. This is clearly described in paragraphs 0031 and 0034-0036 of Prokupets.

Indeed, paragraph 0034 of Prokupets conclusively demonstrates that the server 12 does not operate as a packet forwarding/switching router. To this end, paragraph 0034 clearly states that the server 12 receives packets, strips out and processes the data, and then generates new data packets for transmission. Such is not the operation of a router.

Nevertheless, although the security server 12 clearly does not constitute a "router" as that term is normally used in IT circles, it is believed that the Examiner has applied an extremely broad definition of the term "router". Accordingly, to clarify the claimed invention, claim 1 has been amended to specify that the isolating router comprises "a router configured to receive and store data packets, and to forward the *received* data packets". As discussed above, the security server of Prokupets clearly does not operate in such a manner. (See Prokupets at paragraphs 0034-0036). The security server does not forward data packets that it receives.

Accordingly, Prokupets fails to disclose each and every element of claim 1, as amended. In particular, Prokupets fails to disclose "an isolating router coupling said first network to said second network and operable to isolate said first network from data transmission traffic in said second network, the isolating router comprising a router

configured to receive and store data packets, and to forward the received data packets”, as claimed in claim 1. As a consequence, it is respectfully submitted that the anticipation rejection of claim 1 is in error and should be withdrawn.

### III. Claim 2

Claim 2 stands rejected as allegedly being anticipated by Prokupets. Claim 2 depends from and incorporates all of the limitations of claim 1. Accordingly, for at least the same reasons as those set forth above in connection with claim 1, it is respectfully submitted that the anticipation rejection of claim 2 is in error and should be withdrawn.

### IV. Claims 3-6

Claims 3-6 stands rejected as allegedly being obvious over Prokupets in view of other art. Claims 3-6 depend from and incorporate all of the limitations of claim 1. Accordingly, claim 5 incorporates a limitation directed to an “isolating router comprising a router configured to receive and store data packets, and to forward the received data packets”. As discussed above in connection with claim 1, Prokupets fails to teach or suggest such an isolating router.

Moreover, none of the modifications of Prokupets proposed by the Examiner in the rejections of claims 3-6 cure the deficiencies of Prokupets with respect to claim 1. Accordingly, for at least the same reasons as those set forth above in connection with claim 1, it is respectfully submitted that the obviousness rejection of claims 3-6 are in error and should be withdrawn.

V. The Rejection of Claims 7 and 14 are in Error

Similar to claim 1, independent claims 7 and 14 stand rejected as allegedly being anticipated by Prokupets. Claims 7 and 14, as amended, recite an *IP router*. In the rejection of claims 7 and 14, the Examiner again relies on the “security server 12” of Prokupets as constituting the claimed router. (See Final office action at p.4). As discussed above, the security server 12 of Prokupets does not constitute a “router” as that term is normally used. Even if the generic term “router” were defined extremely broadly, the security server 12 of Prokupets certainly does not constitute an *IP router*.

Because Prokupets does not teach an *IP router* as claimed in amended claims 7 and 14, it is respectfully submitted that the rejections of claims 7 and 14 over Prokupets are in error and should be withdrawn.

VI. Claims 8-13 and 15-20

Claims 8-13 and 15-20 all stand rejected as allegedly being anticipated by Prokupets, or as obvious over Prokupets in view of other references. Claims 8-13 and 15-20 all depend from and incorporate all of the limitations of one of claims 7 or 14. As discussed above, Prokupets fails to disclose each and every element of either of claims 7 or 14. Moreover, none of the modifications of Prokupets proposed by the Examiner overcome the deficiencies of Prokupets with respect to claims 7 and 14. Accordingly, for at least the same reasons as those set forth above in connection with claims 7 and/or 14, it is respectfully submitted that the rejections of claims 8-13 and 15-20 are in error and should be withdrawn.

VII. Conclusion

For all of the foregoing reasons, it is respectfully submitted the applicant has made a patentable contribution to the art. Favorable reconsideration and allowance of this application is therefore respectfully requested.

In the event applicant has inadvertently overlooked the need for an extension of time or payment of an additional fee, the applicant conditionally petitions therefore, and authorizes any fee deficiency to be charged to deposit account 13-0014.

Respectfully submitted,



Harold C. Moore  
Attorney for Applicants  
Attorney Registration No. 37,892  
Maginot Moore & Beck  
Chase Tower  
111 Monument Circle, Suite 3250  
Indianapolis, Indiana 46204-5109  
Telephone: (317) 638-2922